

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

STATE OF MISSOURI, ET AL.,

CIVIL ACTION NO. 3:22-cv-01213

VERSUS

JUDGE: TERRY A. DOUGHTY

JOSEPH R. BIDEN, ET AL.

**MAGISTRATE JUDGE: KAYLA D.
MCCLUSKY**

DECLARATION OF DR. JOSEPH MERCOLA

I, Dr. Joseph Mercola, declare as follows:

1. I am one of the four individual Applicant-Interveners on whose behalf this Motion has been filed, and am founder of a public-health advocacy organization. This declaration is made in support of the Applicants' Notice of Motion and Motion to Intervene for Access to Discovery and for its Filing as Judicial Record, or for *In Camera* Inspection in *Missouri v. Biden, et al.*, No. 3:22-cv-01213-TAD-KDM. If called as a witness, I could and would testify competently to the facts herein, except as to those matters stated on information and belief.

2. I am the founder and owner of Mercola.com, which is, *inter alia*, a public health advocacy organization. Through that entity and in my individual capacity, I am an online Covid 19-news publisher whose speech the federal government defendants in this case have colluded with major social media platforms to censor. These defendants have engaged in such suppression of speech in order to curb my heartfelt and factual criticism of the government's response to the Covid-19 pandemic and to silence disfavored facts and opinions concerning a variety of subjects,

including Covid 19's potential lab-leak origin, the comparative benefits of early treatment and natural immunity, and the risks or inefficacy of Covid-19 vaccines mandated under emergency use authorizations.

3. I am also a board-certified family medicine osteopathic physician, three-times *New York Times* bestselling author, fellow of the American College of Nutrition since October 2012, and former chairman of the family medicine department at St. Alexius Medical Center. I have written more than 30 scientific studies and reports on topics ranging from the dangers of aspartame to mercury toxicity. For more than two decades, I have been "ahead of the curve" on natural health innovation. In 1999, for example, I reported on the dangers of the nonsteroidal anti-inflammatory drug Vioxx, five years before manufacturer Merck withdrew the drug from the market because of its potential to cause adverse cardiovascular effects. In 2001, I warned against the use of mercury in dentistry, 16 years before the Minamata Convention on Mercury banned the import and export of dental amalgam containing mercury. In 2006, I advised against ingestion of the artificial sweetener aspartame based on its connection to leukemia and other health conditions, nine years before *The Washington Post* reported on such dangers. My work for public health has included supporting California Ballot Proposition 37 relating to GMO food labeling, promoting the regenerative agriculture movement, and partnering with Caminos de Agua to assist rural communities in Mexico to access clean, uncontaminated water.

4. In 1997, I founded Mercola.com as a portal for natural health information and resources, one of the first websites established to serve users interested in holistic medicine. Today Mercola.com routinely ranks as one of the top-ten natural health websites, with more than one million newsletter subscribers and more than 10 million page views per month. Nevertheless, Facebook and Twitter have "graylisted" or "ghosted" (*i.e.*, hidden from public

view by means not disclosed to me) Mercola.com's accounts, making them more difficult to find and lowering their place in algorithm results. In addition, beginning late in 2020, Twitter (without providing any actual notification), began blocking users from sharing any links to the Mercola.com website or articles thereon. On April 20, 2021, Facebook banned Mercola's Chinese, Japanese, and Korean foreign-language accounts. On September 29, 2021, YouTube de-platformed Mercola.com without prior notice, in violation of YouTube's own terms of service and community guidelines. Based on that de-platforming, I and my affiliated entity Mercola.com have filed an action for breach of contract, among other counts, in the United States District Court for the Northern District of California.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge and that this declaration was executed in Fort Myers, Florida on November 16, 2022.



DR. JOSEPH MERCOLA